

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

ALLEN HANSON,
Plaintiff

v.

**RHODE ISLAND DEPARTMENT OF
CORRECTIONS; et al.,**
Defendant

C.A. No. 1:17-cv-00598-WES-PAS

ASSENTED TO MOTION FOR EXTENSION OF TIME

NOW COMES Defendants the Rhode Island Department of Corrections (“RIDOC”); Patricia A. Coyne-Fague in her official capacity (“Director Coyne-Fague”); and, Correctional Officer Panerello in their official capacity (“CO Panerello”) (collectively, the “State” or “State Defendants”), and hereby move this Court for an Order consolidating and/or extending the deadlines for State Defendants to answer or otherwise respond to the Third Amended Complaint (ECF 83) of Plaintiff Allen J. Hanson (“Plaintiff” or “Hanson”). As reasons therefore, the undersigned represents that such an extension is necessary because of the applicable rules and protocols regarding service on the State and State officials. See Fed. R. Civ. P. 4(j)(2); R.I. Super Ct. R. Civ. P. 4(e)(4); R.I. Gen. Laws § 9-31-7. On December 10, 2020, Plaintiff filed the Third Amended Complaint (ECF 83). On Monday, December 14, 2020, State Defendants received a request to waive service, pursuant to Fed. R. Civ. P. 4(d). To avoid unnecessary expense and to protect the health and safety of all persons involved in this matter, State Defendants agree to waive service of the summonses, consistent with Fed. R. Civ. P. 4(d).

WHEREFORE, for the reasons set forth above, State Defendants respectfully ask that this Honorable Court enter an Order, pursuant to Fed. R. Civ. P. 4(d), consolidating and/or extending

the deadlines for State Defendants to answer or otherwise respond to the Third Amended Complaint (ECF 83), up to and including **Friday, February 12, 2021**.

NOTICE OF ASSENT

Counsel for Plaintiff has reviewed the foregoing Motion and assents to the State's request.

Respectfully Submitted,

STATE DEFENDANTS,
By:

PETER F. NERONHA
ATTORNEY GENERAL

/s/ Justin J. Sullivan

Justin J. Sullivan (#9770)
Special Assistant Attorney General
150 South Main St. Providence, RI 02903
Tel: (401) 274-4400 | Ext. 2007
Fax (401) 222-2995
jjsullivan@riag.ri.gov

CERTIFICATE OF SERVICE

I hereby certify that on Thursday, December 24, 2020 I electronically filed the foregoing document with the United States District Court for the District of Rhode Island by using the CM/ECF system. I certify that the following parties or their counsel of record are registered as ECF Filers and that they will be served by the CM/ECF system:

Stacey P. Nakasian, Esq.
snakasian@duffysweeney.com

Ronald C. Desnoyers, Esq.
desnoyerslaw@gmail.com

/s/Justin J. Sullivan